

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

BAIMADAJIE ANGWANG,

Defendant.

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APPLICATION

Docket No. 20 CR 442 (EK)

BREON PEACE, United States Attorney for the Eastern District of New York, by J. Matthew Haggans, Assistant United States Attorney, applies to the Court for an Order dismissing without prejudice the above-captioned indictment, Criminal Docket No. 20-442 (EK), as to defendant BAIMADAJIE ANGWANG:

1. On or about September 19, 2020, defendant BAIMADAJIE ANGWANG was charged by complaint with acting as an agent of the government of the People's Republic of China ("PRC") without prior notification to the Attorney General, in violation of Title 18, United States Code, Section 951; committing wire fraud, in violation of Title 18, United States Code, Section 1343; making false statements, in violation of Title 18, United States Code, Section 1001; and obstructing an official proceeding, in violation of Title 18, United States Code, Section 1512(c). On or about October 13, 2020, a grand jury in the Eastern District of New York returned an indictment charging BAIMADAJIE ANGWANG with those same four offenses.

2. As a result of our continued investigation, the government obtained additional information bearing on the charges. Having assessed the evidence as a whole in light of that

information, pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the government hereby moves, in the interests of justice, to dismiss the indictment without prejudice.

Dated: Brooklyn, New York
January 13, 2023



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National Security Division
U.S. Department of Justice

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ORDER

Docket No. 20 CR 442 (EK)

Upon the application of BREON PEACE, United States Attorney for the Eastern District of New York, by Assistant United States Attorney J. Matthew Haggans, it is hereby

ORDERED that, pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the underlying indictment, Criminal Docket No. 20-442, Dkt. No. 20, be dismissed without prejudice.

Dated: Brooklyn, New York
_____, 2023

HONORABLE ERIC R. KOMITEE
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK